1	RENE L. VALLADARES Federal Public Defender		
2	Nevada State Bar No. 11479 REBECCA LEVY		
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7	Attorney for Oscar Carranza		
8	UNITED STATES DISTRICT COURT		
9	DISTRICT OF NEVADA		
10	UNITED STATES OF AMERICA,	Case No. 2:10-cr-00532-RLH-GWF	
11	Plaintiff,	UNOPPOSED MOTION FOR EARLY	
12	V.	TERMINATION OF SUPERVISED	
13	OSCAR ARMANDO CARRANZA,	RELEASE	
14	Defendant.		
15	- Defendant.		
16	COMES NOW the defendant OSCAL	R CARRANZA by and through counsel	
17	COMES NOW, the defendant, OSCAR CARRANZA, by and through counsel,		
18	Assistant Federal Public Defender and files this unopposed motion to terminate his supervised release. This motion is based on all prior proceedings had herein and the attached memorandum		
19		ngs nad herem and the attached memorandum	
20	of points and authorities.		
21	DATED this February 22, 2016		
22		RENE VALLADARES Federal Public Defender	
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24	I	By: <u>/s/ Shari L. Kaufman for</u>	
25		REBECCA A. LEVY Assistant Federal Public Defender	
26		Attorney for Oscar Carranza	

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#### MEMORANDUM OF POINTS AND AUTHORITIES

The statute governing early termination of supervised release 18 U.S.C. § 3583(e)(1), provides that the court may "terminate a term of supervised release and discharge the defendant released at any time after the expiration of one year of supervised release."

On October 26, 2010, Oscar Carranza was indicted by a grand jury and charged with three counts of False Statement(s) During the Purchase of a Firearm, in violation of 18 U.S.C. § 922(a)(6). (Docket #1) Mr. Carranza was arrested and made his initial appearance on January 26, 2011. (Docket #12) United States Magistrate Judge Foley, ordered his continued release on a Personal Recognizance bond with Pretrial Services Supervision. *Id.* Mr. Carranza remained on release without any violations of pre-trial supervision through the pendency of the case. On June 8, 2012, Mr. Carranza appeared before your Honor and plead guilty with the benefit of a plea agreement. (Docket #61). Your Honor sentenced Mr. Carranza on September 24, 2012, to eighteen months in custody, three years of supervised release and a penalty assessment of \$300, (Docket #74).

Mr. Carranza is 51-years old and has completed half of the thirty six months of supervision the Court ordered. Mr. Carranza has no history of drug or alcohol abuse and has been compliant with all of the conditions of supervision and does not pose any risk to public safety. His crime was not one of violence. Mr. Carranza has no unresolved charges or any violations of supervision. This offense is the only criminal arrest or conviction Mr. Carranza has ever sustained.

Mr. Carranza is not currently receiving any services from the probation department. He has been compliant with all conditions of his supervision, but has been having a difficult time finding employment in the Las Vegas community. There is simply no reason he should remain on supervision. Mr. Carranza should be released early from supervised release. Assistant United States Attorney Pamela Martin does not object to the early termination of Mr. Carranza's supervision.

1 **CONCLUSION** 2 There are no additional or necessary services that Probation can provide Mr. 3 Carranza. Mr. Carranza's exemplary conduct during his supervision and the interests of justice, 4 justify early termination from supervision in this case. This Motion is unopposed by the 5 government. 6 For the aforementioned reasons, Mr. Carranza respectfully requests that this 7 Court terminate his period of supervision pursuant to Title 18 U.S.C. § 3583(e)(1). 8 DATED this 22<sup>nd</sup> day of February 22, 2016. 9 10 RENE VALLADARES Federal Public Defender 11 By: /s/ Shari L. Kaufman for 12 REBECCA A. LEVY 13 Assistant Federal Public Defender Attorney for Oscar Carranza 14 15 IT IS SO ORDERED. 16 17 18 STATES DISTRICT JUDGE 19 DATED: February 23, 2016 20 21 22 23 24

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1 CERTIFICATE OF ELECTRONIC SERVICE 2 The undersigned hereby certifies that she is an employee of the Federal Public Defender 3 for the District of Nevada and is a person of such age and discretion as to be competent to serve 4 That on February 22, 2016, she served an electronic copy of the above and papers. 5 foregoing, UNOPPOSED MOTION FOR EARLY TERMINATION OF SUPERVISION 6 PURSUANT TO 18 U.S.C. § 3583(e)(1), by electronic service to all parties of record including 7 the persons named below: 8 9 DANIEL G. BOGDEN United States Attorney 10 **BRADLEY GILES** Assistant United States Attorney 11 333 Las Vegas Blvd. So., 5th Floor 12 Las Vegas, Nevada 89101 13 Via Electronic Mail to: Leo Sanchez 14 UNITED STATES PROBATION 15 **United States Probation Officer** 16 /s/ Bernadette Almeida 17 Legal Assistant 18 Employee of the Federal Public Defender 19 20 21 22 23 24 25 26